

1 Luke Busby, Esq.  
2 Nevada State Bar #10319  
3 316 California Avenue  
4 Reno, Nevada 89509  
5 (775) 453-0112  
6 [luke@lukeandrewbusbyltd.com](mailto:luke@lukeandrewbusbyltd.com)

7 Lauren Gorman, Esq.  
8 Nevada State Bar #11580  
9 275 Hill Street, Suite 248  
10 Reno, Nevada 89501  
11 (775) 742-6129  
12 [lgorman@laurengormanlaw.com](mailto:lgorman@laurengormanlaw.com)  
13 *Attorneys for the Plaintiffs*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 ERICA BLUTH, an individual, and  
17 LAVORIA WILSON, an individual,

18 Plaintiff,

19 v.

20 TYLER BAEHR, and individual, and THE  
21 CITY OF RENO, a political subdivision of  
22 the State of Nevada.,

23 Defendants.

Case No.: 3:25-cv-00129 ART-CSD

**PLAINTIFFS' PROPOSED  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE  
WITH LR 26-1(b)**

24 Pursuant to the requirements of Fed. R. Civ. P. 26(f) and LR 26-1, the Plaintiffs  
25 submit the following Proposed Discovery Plan and Scheduling Order in the  
26  
27  
28

1 above-captioned matter. Defendant City of Reno has declined to stipulate to this plan,  
2 necessitating separate submission by the Plaintiffs. See Exhibit 1.

3 **A. Information Requested by Fed. R. Civ. P. 26(f):**

4 **Rule 26(f) Conference and Initial Disclosures:** Counsel for the Plaintiffs and  
5 the City of Reno conducted a meeting pursuant to Federal Rule of Civil Procedure 26(f)  
6 and Local Rule 26-1 on Monday, April 14, 2025. The Plaintiffs propose that the parties  
7 serve initial disclosures in accordance with Federal Rule of Civil Procedure 26(a) on or  
8 before Monday, April 28, 2025. The City of Reno has objected to the default 14-day  
9 timeframe for initial disclosures, citing its intention to seek a stay pending a related  
10 criminal matter (Case No. 3:25-CR-00002-MMD-CSD).  
11

12 **Scope of Discovery:** Discovery may be conducted on all discoverable matters  
13 relevant to issues raised by the Complaint (ECF No. 1), the City of Reno's Answer and  
14 Affirmative Defenses (ECF No. 6), and any subsequent pleadings, consistent with the  
15 Federal Rules of Civil Procedure and the Local Rules of this District.  
16

17 **Proposed Changes to Rules:** No changes or limitations to the Federal Rules of  
18 Civil Procedure or Local Rules for the District of Nevada are requested at this time.  
19

20 **B. Information Requested by LR 26-1:**

21 **Discovery Cut-Off Date:** The Plaintiffs propose a discovery period of one  
22 hundred eighty (180) days from April 14, 2025, the date of the early case conference.  
23 All discovery must be completed no later than Friday, October 10, 2025. When  
24 producing documents responsive to a discovery request, the documents shall be  
25 numbered, and the responsive documents shall be specifically referred to by Bates  
26 number in the response. The parties anticipate that their initial, supplemental, and  
27  
28

1 responsive production of materials will be in .pdf and/or paper formats, served by  
2 electronic means where feasible.

3 **Amending the Pleadings and Adding Parties:** The date for filing motions to  
4 amend the pleadings or to add parties shall not be later than ninety (90) days after the  
5 Rule 26(f) conference and, therefore, not later than Monday, July 14, 2025. Any party  
6 causing additional parties to be joined or brought into this action shall  
7 contemporaneously therewith cause a copy of this Order to be served upon the new  
8 party or parties.  
9

10 **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** The last day for disclosures  
11 required by Fed. R. Civ. P. 26(a)(2) concerning experts shall be Monday, August 11,  
12 2025. The last day for disclosures regarding rebuttal experts shall be Wednesday,  
13 September 10, 2025.  
14

15 **Dispositive Motions:** The parties shall file dispositive motions not more than  
16 thirty (30) days after the discovery cut-off date and, therefore, not later than Monday,  
17 November 10, 2025.  
18

19 **Pretrial Order:** If no dispositive motions are filed, and unless otherwise ordered  
20 by this Court, the Joint Pretrial Order shall be filed not more than thirty (30) days after  
21 the date set for filing dispositive motions and, therefore, not later than Wednesday,  
22 December 10, 2025. In the event dispositive motions are filed, the last day to file the  
23 Joint Pretrial Order shall be suspended until thirty (30) days after the ruling on the  
24 dispositive motions.  
25

26 **C. Certifications:** By signing below, the Plaintiffs make the following  
27 certifications: (1) The parties have met and conferred about the possibility of using  
28

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1 alternative dispute-resolution processes, including mediation, arbitration, and, if  
2 applicable, early neutral evaluation; and (2) The parties have considered consent to trial  
3 by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73.

4  
5 Dated: Apr 23, 2025

6 By: /s/ Luke Busby, Esq.

7 Luke Busby, Esq.  
8 Nevada State Bar #10319  
9 316 California Avenue  
10 Reno, Nevada 89509  
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12 [luke@lukeandrewbusbyltd.com](mailto:luke@lukeandrewbusbyltd.com)

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18 [lgorman@laurengormanlaw.com](mailto:lgorman@laurengormanlaw.com)  
19 *Attorneys for the Plaintiffs*

20 IT IS SO ORDERED:

21 UNITED STATES MAGISTRATE JUDGE

22 DATED: \_\_\_\_\_  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I certify that on the date shown below, I caused service to be completed of a true and correct copy of the foregoing by:

\_\_\_\_\_ personally delivering;  
\_\_\_\_\_ delivery via Reno/Carson Messenger Service;  
\_\_\_\_\_ sending via Federal Express (or other overnight delivery service);  
\_\_\_\_\_ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,  
\_\_\_x\_\_\_ delivery via electronic means (fax, eflex, NEF, etc.) to:

Peter K Keegan  
Reno City Attorney  
1 East 1st Street  
Reno, NV 89510  
775-220-1426  
Email: keeganp@reno.gov

Apr 23, 2025

By: /s/ Luke Busby, Esq.

Luke Busby, Esq.  
Nevada State Bar #10319  
316 California Avenue  
Reno, Nevada 89509  
Phone (775) 453-0112  
luke@lukeandrewbusbyltd.com  
Attorney for the Plaintiff